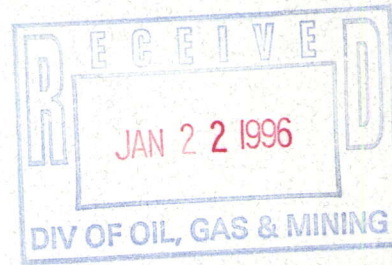


January 18, 1996

Tony Gallegos
Department of Natural Resources
Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203



Re: Harper Contracting Parleys Canyon

Mr. Gallegos:

Enclosed are the following materials related to Harper Contracting's Parleys Canyon LMO:

- Response letter to your December 6, 1995 letter
- Redline/Strikeout version of the revised LMO-NOI according to your December 6, 1995 letter (less attachments and plates)
- Revised copy of LMO-NOI
- Aerial photograph of project location (provided in separate tube)

The Reclamation Contract and Surety Bond forms will be forwarded to you in draft form in the near future. Please do not hesitate to contact me or Lawnie Mayhew should you have any questions.

Sincerely,

Douglas Jones
Environmental/Mining Engineer

cc: Lawnie Mayhew (less aerial photograph)



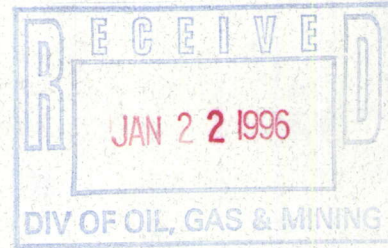
*"People Working With
People Safely"*

CONTRACTING • EXCAVATING
TRUCKING • U.S.T. REMOVALS
SAND & GRAVEL • HAZARDOUS
MATERIALS SPECIALIST

P.O. Box 18400
Kearns, Utah 84118
8201 West 5400 South
Salt Lake City, Utah
Phone (801) 250-0132
Fax (801) 250-0671

January 18, 1996

Tony Gallegos
Department of Natural Resources
Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203



Re: Response To Your Request For Additional Information, NOI-LMO Harper Contracting, Inc., Parleys Canyon Quarry, M/035/012

Dear Mr. Gallegos;

We are submitting information contained in this letter, and a revised NOI-LMO in response to your letter dated December 6, 1995. In addition to addressing your concerns, the revised NOI-LMO includes changes to incorporate a proposed small expansion (approximately 1.2 acres) of the operations area.

The format of this response is in the order of concerns presented in your letter and use the same headings. If the NOI-LMO was revised to address your comments, then the corresponding changed section is referenced. The revised NOI-LMO is presented in redline/strikeout form so that all changes can be quickly identified to minimize your review efforts. A complete replacement NOI-LMO with redline/strikeout markings removed and revised plates 1-4 and addition of Plate 5 is also included with this submission.

R647-4-105 Maps, Drawings & Photographs

105.2 Surface Facilities Map

An additional map (Plate 5) is being provided with the revised NOI-LMO which identifies total existing disturbed areas and areas which will be affected by the large mine operations. Also shown on Plate 5 are concerns expressed in your letter for the next heading, and the additional expanded operations area which was not addressed in the original NOI-LMO.



R647-4-106 Operation Plan

106.3 Estimated acreages disturbed, reclaimed, annually

Plates 1 - 4 have been revised and Plate 5 added to clearly show areas and features to be affected by the proposed LMO, as well as areas affected by past LMO operations. The LMO-NOI has been revised accordingly throughout to include a more detailed description of the areas affected and to incorporate the expanded operations area.

In addition, a table is added in Section 4.3 of the NOI in a format similar that contained in your December 6, 1995 letter.

The addition of Plate 5 and review of the revised Plate 4 should address the concern expressed in your letter regarding existing features which will not be reclaimed as part of the final reclamation. The only features which will not be reclaimed is the existing access road on Forest Service property, the ore slide, and the portion of the operations area which will remain a county owned road.

106.4 Nature of Materials mined, waste and estimated tonnages

The NOI Section 9.2 contains an estimate that 2000 cubic yards of loose material will remain in the pit as an unsalable product. This estimate includes any material that was used for site grading to construct the operations area. All material produced at the location will be considered a salable product when produced and stockpiled on-site. Harper Contracting intends on selling all materials generated in the pit, however, it is possible that some of the product generated could remain in the pit if an immediate market at the time of closure is not available. The amount of loose material to remain in the pit is not anticipated to exceed the 2000 cubic yards, will be regraded as described in the NOI, and could be any of the products listed in Section 4.1 of the NOI.

106.7 Existing vegetation-species and amount

Plate 4 has been revised to show additional areas to be revegetated. These areas include the benches in the proposed pit and the expanded operations area.

R647-4-109 Impact Assessment

109.4 Slope stability, erosion control, air quality, safety

The proposed operation will not create any new additional slopes. The only existing slopes to be affected by the proposed operations would be the ore slide area. Existing slopes towards the freeway would not be affected. This slope is currently a talus slope which was impacted by past mining operations. The proposed mining operations would shorten this slope as mining

progresses, therefore lessening the erosion potential from the current status. The final slope would also be talus material and is not planned to be seeded or modified to create surface roughness. *O.K. by me*

R647-4-110 Reclamation Plan

110.2 Roads, highwall, slopes, drainages, pits, etc. reclaimed

Angle of repose slopes could occur in the operations area due to stockpiling of products. As discussed in this letter in 106.4 and in the NOI in Section 9.2, any remaining loose material in the operational area will be regraded to a 3h:1v slope. Angle of repose slopes are also currently present and will exist following operations in the ore slide area. This slope is a natural slope which cannot be regraded due to its length. The regraded areas in the operations area are indicated on Plate 4. The final ore slide area which cannot be regraded is indicated on Plate 5.

There are no drainages which will be rerouted as a result of final reclamation.

110.5 Revegetation planting program

Plate 4 has been modified to show revegetation of the mine benches and the expanded operations area. The text of the NOI has been modified accordingly.

The NOI Section 7 has been modified to remove reference to dragging a chain over the seeded areas and to reference the mulching as recommended in your letter.

R647-4-111 Variances

R647-4-111 Highwalls

The proposed pit highwall would have an overall maximum height of approximately 350 feet and consist of a series of benches. Planned mining benches are to range in dimensions of 15' X 15' to 30' X 30'. The planned overall slope of the highwall regardless of the bench size will be 45° or less. The horizontal length of the highwall would be a maximum of approximately 1100' at the base of the proposed pit and taper to approximately 250 feet at the top or beginning mine bench area. The final proposed highwall is indicated on Plates 3 and 4.

The limestone in the pit is a competent material. Existing outcroppings and features left from previous mining operations demonstrate that highwall stability is not expected to be a problem.

Previous mining operations left areas surrounding the proposed new mining operations with varying features. These features are characterized by highwalls or natural outcroppings which vary in size but can be greater than 30 vertical feet, tapering benches caused by internal access roads, and long (greater than 600' slope distance) talus slopes with no internal benches. These existing features can be determined through review of contours shown on Plates 1 - 5. In

addition, an aerial photograph is being provided as an attachment to this letter which provides a visual demonstration of existing features.

R647-4-111 Topsoil Redistribution

A more detailed analysis of existing undisturbed areas has been completed to address concerns expressed in your letter. Plate 1, Existing Disturbance, has been modified as a result of this more detailed analysis. Modifications to Plate 1 result through review of an aerial photograph of the area to locate areas containing vegetation and no man made features. These areas are shown on Plate 1 as previously undisturbed areas, although on-site inspections find that the surface materials in the previously undisturbed islands shown on Plate 1 contain talus material caused by previous mining operations in the steep terrain surrounding these areas.

The area to be newly disturbed by Harper operations is an existing island which contains vegetation and is located in an area which will mainly be covered by the final pit floor. A portion of this island is located in an area where the final highwall will be located. Plate 5 includes an overlay of Plate 1 and Plate 3 showing this currently vegetated island in relation to the final pit.

While this island currently contains some vegetation, the surface material found in this island consists of talus material generated from previous mining operations, and solid limestone outcroppings. There is no topsoil available to salvage in this island. In addition, the vegetated island is steep terrain which is not accessible to equipment. There is no recoverable topsoil available in this island.

R647-4-111 Revegetation

The NOI has been modified to include reclamation/revegetation of all areas disturbed by Harper operations except the ore slide, the existing pit access road, and the portion of the operations area which will remain a county owned road. The ore slide is not proposed for revegetation due to the steepness and length of the slope which is inaccessible to equipment, and the lack of expected vegetation success due to the existing and final talus material which will exist on the slope. Also, Section 8.0 of the NOI is revised to state that revegetation will be considered successful when completed according to the revegetation plan contained in the NOI.

R647-4-113 Surety

The surety calculations in the NOI have been revised to include the additional areas to be reclaimed in response to your letter, additional reclaimed areas due to the expanded operation area, revised ripping costs as determined through DOGM assistance, and inclusion of line items of general site cleanup and trash removal, reclamation/revegetation supervision, and contingency and escalation as contained in your letter.

If you have any questions please do not hesitate to contact me or Doug Jones with JBR Environmental Consultants at 943-4144.

Sincerely,

A handwritten signature in cursive script, reading "Lawnie Mayhew". The signature is written in black ink and is positioned above the printed name and title.

Lawnie Mayhew
Environmental Coordinator

cc: Doug Jones